

EXHIBIT 1-A

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May 28, 2020

Via Electronic Mail

LAW OFFICES OF MICHAEL S. LAMONSOFF, PLLC
Financial Square at 32 Old Slip, 8th Floor
New York, NY 10005

**Re: Mannarino v. FCA US LLC
2:18-cv-10173-DML-DRG (E.D. Mich.)**

Dear Counsel,

As you are aware, on April 9, 2020, the Court entered an Order approving the Parties' stipulation to extend the time to take the depositions of third-party witnesses Detective Steve Horn, Derek Elam, and Gregory Chambers until July 10, 2020. In an effort to complete the remaining fact witness depositions, we ask that you please provide available dates between June 29, 2020 and July 9, 2020. It should be feasible to complete these three depositions in one day, and we will reserve the option of proceeding by videoconference if conditions relating to the COVID-19 outbreak do not improve before that date.

As you are also aware, FCA US will be filing a motion for reconsideration of the Court's May 20, 2020 Order extending Plaintiff's time for expert disclosures. FCA US will be seeking to exclude the nine experts in Plaintiff's May 22, 2020 identity disclosures who were not previously disclosed in any of Plaintiff's filings or otherwise raised with the Court. In the alternative, if the Court is not inclined to grant this request, FCA US will be seeking additional time to complete its own expert reports and to take the depositions of the eleven experts identified in Plaintiff's May 22, 2020 identity disclosures. Without waiving any of the arguments in FCA US's forthcoming motion, we request that you please provide dates that all eleven of your experts will be available for deposition between the dates of July 1 and July 15, 2020. As with the remaining fact witnesses depositions, we will be prepared to proceed by videoconference if conditions in New York and elsewhere do not permit otherwise.

Kindly respond to this correspondence with available dates no later than June 2, 2020.

Very Truly Yours,

/s/ Kiernan G. Cavanagh

Kiernan G. Cavanagh